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City of North Liberty ● 25 West Cherry Street ◆ P.O. Box 67 ◆ North Liberty Iowa ◆ 52317 ◆ (319) 626-5700/FAX 3288

December 20, 2002

Department of the Army
Rock Island District
Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Ms. Hagerty:

On behalf of the City of North Liberty, Iowa, I am submitting this response to the environmental assessment of the proposed lease at the Coralville Lake, Johnson County, Iowa. The City of North Liberty disagrees with the Environmental Assessment Report prepared by Zambrana Engineering, Inc. in several respects. The report states that Alternative 1 as proposed **as** the preferred alternative does not significantly impact the environment, **is** consistent with the project purpose and need, **is** consistent with the Corps' Master Plan and designated land use for the site, and provides increased recreational benefit to the greatest number of users.

The City strongly **disagrees** with the assessment that the project provides no significant **impact** to the environment. The **City** believes that the mere fact that the project **seeks** to obtain a variance for siting a waste water treatment facility on the property is at odds with the assessment that the project will not significantly impact the environment. The Iowa Department of Natural Resources guidelines for siting treatment facilities are strict and have been strictly enforced for the protection of the public. The variance is directly at odds with the IDNR regulations. If the proposed project was in harmony with the environmental regulations of the Iowa Department of Natural Resources, a variance would not be needed. No approval of this project should be granted without, **at least**, input from the Iowa Department of Natural Resources.]

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6-1 — The report further provides that the project has a consistent purpose and need. **The** report suggests that the site will include a conference center that will be actively marketed for use during the off-camping season. [The conference center does not **appear** to be consistent with the Corps' Master Plan or provide recreational benefits to the **area**.] **The** marketing of a conference

22-2
22-2 center will require significantly more parking than is currently provided on site. If it is, as **has** been rumored, the group's intent to use buses to move people to and from the site, this would create significant traffic issues on **an** unimproved rural county **road**. The report suggests that a parking lot will be established in the City of North Liberty to use as-a loading and unloading location for persons wanting to use the convention center. No one from the MYCA group **has** approached the City with its plans for a parking lot. In fact, there **is** some question whether **such** a private parking lot, as apparently contemplated in the report, would be a permitted use in the City of North Liberty under its current **zoning** regulations. This issue must be **addressed and** resolved, in the City's opinion, prior to entering into any lease agreement with the MYCA group.

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33-32 The report further provides that there will be no impact to life, health and safety under the proposed Alternative 1 project. Attached is a letter from the North Liberty Fire Chief outlining the safety concerns expressed by the North Liberty Fire Department. The report states that there would be no danger to persons if a fire was to occur, since it is contemplated that so few persons would be at the campsite during any time of the year. While there may not be an immediate danger to campers using the area, the City believes that there would **be** a real and significant danger to the firefighters and general public if a fire did occur. The roadway is inadequate, at the current time, to move equipment safely to the area. The conference center, as proposed, is a 70' x 250' structure and **is** not defined well enough in the report to filly judge the **impact** of a fire at the site. However, the sheer size of the building would create a significant problem in fighting and controlling a fire due to the lack of the amounts of water and water pressure necessary to battle a fire. In order to provide **adequate** fire protection for the **users**, the public and the **firefighters**, the project, if approved, would require the North Liberty Fire Department and City of North Liberty to **spend** significant **sums** of money to upgrade the equipment and fire fighting capability. The City believes that there will be **an** impact to life, health and safety under Alternative 1 as proposed. Further inquiry **as** to **this** issue should **be** made and resolved prior to entering into a lease with the **MYCA** group.

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6-17
20-9 A third item specified in the report with which the City **disagrees is** the idea that the proposed MYCA project is consistent with the Corps of Engineers' Master Plan and designated land **use** for the **site**. First of all, the Plan itself is out of date and raises questions as to what the land should now be used for. Updates in 1985 on certain parts of the Plan were performed but did not seem to be applicable to the type of use **designated** in the Plan. It is somewhat unclear as to the **exact** land use designation given to the **property**. No one disputes that a campground used 3-4 months per year for camping creates any significant problems for the area. The problem is the proposed expanded use of the conference center that appears to be more commercial in nature than recreational. As previously stated, this conference center has the potential of placing significant burden on the road, infrastructure and fire fighting capabilities of the City.

6-17 Finally, the report states that the project will be used by the greatest number of users for recreational benefits. It appears that the commercial nature of the conference center and the proposed **uses** of the conference center do not provide recreational benefits of the sort which would complement the **area's** natural environment. Even if the conference center were to provide indoor recreational benefits, the conference center could be placed in **an area** providing less of a detrimental impact to the natural environment of the proposed location. The property

2-19 proposed for the conference center is better suited for low impact outdoor recreational uses, considering the area is primarily a woodland and lake setting.

22-13 [Additionally, the report appears to rely on outdated information and does not identify where much of the information contained in the report was obtained. For instance, traffic numbers from 1998 are too old to describe the traffic impact of the area. As you know, this corridor north of North Liberty is growing at a rapid rate, one of the fastest growth rates in the entire State of Iowa. More current traffic numbers are available and should be used in determining traffic impact to the area.) The City of North Liberty believes that the approval of the lease without more significant investigation and resolution of the above issues would be premature at this time. The City believes that the proposed project will have a greater impact on the residents of the City of North Liberty than is recognized in the report by Zambrana Engineering, Inc. The City respectfully requests that the lease agreement, as proposed, not be approved by the Corps of Engineers at this time.

33-32

Respectfully submitted,

CITY OF NORTH LIBERTY



Brian James
City Administrator

cc: Governor Tom Vilsack
U.S. Senator Tom Harkin
U.S. Senator Charles Grassley
Congressman James Leach
Johnson County Board of Supervisors
Penn Township Trustees

NORTH LIBERTY FIRE DEPARTMENT

FIRE/RESCUE/HAZMAT

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TO: RJMOORE
BRIAN JAMES
SARAH HELT

SUBJECT: MYCA PROJECT

Penn Township Trustee Sarah Helt, first contacted me on Wednesday November 20, 2002 in the evening, asking about the article in the Iowa City Gazette. She wanted to know my **feeling** on this camp. She had talked with past Fire Chief Brian Greer in 1999 or 2000 when this issue first came up. We discussed the article. I pointed out some of my feeling to her at that time.

On **Friday** November 22, 2002 I had a short discussion with City Administrator Brain James about MYCA. After **I was** able to get the rest of my work done at the **fire** station. **I** went to the location of campsite off Scales Bend road to 200 St. **I** have never been on this property before, and wanted to check **out** distances. From the North Liberty Fire Station it is approximately 3.6 miles to **the** gate of the campgrounds. I parked **my** pickup outside of the gate, walked down the old roadbed to check the grounds **out**. The old walk bridges to the cabins the cabins are still there. The old cabins have the poles and **floors** are still there. The sidewalls and roof have collapsed onto the floor. There is a lot of under growth of vegetation through out. **I was** able to see the orange **tape** that **marks** the different locations and a blue tape. **I** found the old toilet and shower area and went **over** to the existing picnic shelter. The existing well is a 6" **well** casing which can probably pump a maximum of 30 gallons a minute. From the old lodge foundation **I** walked back to the southeast where the planned parking lot is **to** be located. **I** then **returned** back up the roadbed, which has undergrowth and a tree canopy. From here **I** drove down Cumberland Ridge Road, which runs parallel with the camp lane. It is approximately .3 miles from the gate to where the convention center will be located. From the gate to the Jolly Roger camp ground boat ramp is approximately 1.8 miles, this is one location where a pumper could be set in order to draft out of the lake for water to shuttle. The number of campers and boaters can affect this at the time. There is also a steep grade as you come out of the camp grounds on scales bend road to return to the proposed site and you **will** be coming through residential areas. From the gate, back to North Liberty's nearest hydrant at Pheasant Hill is approximately 2.5 miles.

21-8 I received an email on November 25th that **was** dated November 22nd from RJ Moore. **I** then went that day and talked with the North Liberty building inspector Tom Palmer. We discussed square footage needed for the convention center depending on its use. If only standing space is figured in you will **need** 7 square feet per person, however if the space is to be used for seating with tables you need 15 square feet per person. Using the maximum capacity stated by the Iowa City Gazette of 384 people, the total square footage needed will be 5,760 square feet. This calculation **was** done using North Liberty City standards. These numbers are important in figuring the water flow needed to this site in **case** of a fire.

On December 2nd **I** talked to John Castle, the head of Corps. Of Engineering. John provided a copy of the layout of the campgrounds and showed me a picture of **the** proposed Convention Center. It appeared to be a heavy timber construction, however did not provide **the** height dimensions needed to figure in water flow needed.

21-8 December 3rd **I** met with RJ Moore, Rick Dvorak, and Ruben Arsate. **I** brought several questions concerning what Johnson County had for building codes on property regulations. Johnson

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21-8
County uses United Building Codes. According to Ruben this will be classified as an **A-3** structure under the **UBC**. This is for an occupant load of **less** than 300 with an assembly room for educational purposes but without a legitimate stage, and not classed as group B or E occupancies. **A-3** structures must be of Type I construction. Type I construction must consist of steel, iron, concrete, or masonry. Walls and **permanent** partitions shall be of noncombustible fire-resistant construction. Permanent nonbearing partitions of one-hour or two-hour fire-resistive construction and not part of a shaft enclosure may have fire-retardant treated wood. This type of structure with a floor area that exceeds 1500 square foot will require an automatic sprinkler system.

21-7
My feelings are that Scales Bend Road is one of the worst roads we have in our fire district. It is **narrow and winding** which makes it difficult to drive even in good road conditions. **As** this area is to be used year round the threat of wet, icy, or snowy **driving conditions it is a concern.** The lane **leading** into the camp is to be the existing road of gravel measuring **18** feet across which is not **wide enough for tanker** shuttle, which will have to be established. Some of the trucks will **carry up to 3000 gallons of water** plus the additional truck weight of approximately **48,000** pounds. In the case of an emergency these trucks will be meeting and passing each other on this road with a soft shoulder creating a larger hazard for rescue personnel. I feel that we need a road width of at least **22-24** feet. Due to the length of this lane there is a need for a **turn** around area as set by the **county** supervisor's a few **years** back. We **will also** need a cul-de-sac area at each end of the convention center due to pumper and **portatank** placement needs. In the case of a fire this is very important to staging. We will be sending tanker trucks in dropping their water load into the **porta-tanks** and then **turning** the trucks around in order to send them back **out** for more water. Another concern is the ground elevation, as based on the map. There is a drop of 50 feet from the gate to the convention center and depending on weather conditions this could also cause problems.

21-9
To figure the water flow that will be needed in the case of a fire you need to factor in the total dimensions of the building. These exact numbers have not been provided for me so I have done the best I could with approximate calculations. From the drawing I have factored 107 x 70 or 7490 square feet. From the drawing shown to me by John Castle I have approximated the overall height of the structure to be 30 feet. These numbers calculated together give you an area of 224,700 cubic feet. In order to **best** determine the water needs in case of a fire divide this number by 100 equaling 2,247 gallons of water per minute needed for a time span of 4 hours. In order to achieve this amount we will need at least three (3) pumpers or a pumper and a Quint (ladder truck) to provide that much water flow. Keep in mind that if the convention center or any of the cabins were to catch fire the risk of it spreading to the surrounding wooded areas is great; this unfortunately would stretch our resources even further. We carry 1000 gallon on 112 and 113, which are pumpers; the Quint holds 400 gallons, the tanker carries 1750. There would be a need to call mutual aid, which will also provide us with water as well as manpower. Available would be Swisher tanker at 2000 gallons, Oxford at 2000 gallons, Solon at 1800 gallons, West Branch at 3000 gallons, Hills 2000 gallons, Lone Tree at 2000 gallons, and Riverside at 1500 gallons. Tiffin will have a new truck available by August 2003. This would be using every tank in Johnson County to maintain water flow. Drive time back to the hydrant will be **about** 5 minutes. Depending on hydrant pressure it will take 4-4.5 minutes to fill these tankers, West Branch's truck will take approximately 6 minutes. Driving time back to scene, varying on each tanker and road conditions, will take approximately 6 minutes with a dumping time of **1.5-2** minutes. This needs to be a consideration, as we cannot put in a dry hydrant due to **elevation** factors. The lowest point in the campgrounds is 710 feet and the lake is **673-680 feet**. A dry hydrant can only pull water

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21-11 up 25 feet and at 20 feet the effectiveness is decreased. We would also have trouble laying a
21-12 Nofy hose line. From the road to the cabins you are about 200 feet. One possible solution would
be to widen the trails overall. Widening the trail that runs from north to south by the toilet would
also be helpful in placement of a pumper or for staging of ambulances in the case of a medical
emergency.

21-13 This all said I do have several questions and concerns. In the case of safety, who is going to be
the regulating party over the camp site, such a sprinkler function, total capacity, and campfires
during dry years when the burn ban is in effect. Is this the responsibility of the Fire Department,
Johnson County Sheriff, Johnson County Building Inspectors, or the Corps.? What fines are to
be set for violations? Who is responsible to get the people out of the area if they don't have their
21-16 own vehicles, and if they are using busses how will this affect our ability to get our equipment in
21-17 and set up? Also what type of storm shelter is going to be in place for these people and will it
21-18 meet Maximum capacity needs?

20-1 The camp in itself is not a main concern to me but the convention center is. This is a commercial
property that is being placed Corps. ground. Because of this there is no tax reimbursements to
the City of North Liberty or Penn and Madison Townships. This I feel is unfair to the residents of
the area who will be paying in tax money to help support the protection of the center. You have
to look the possible and most likely increase in traffic accidents, fire and medical coverage,
water rescue and or recovery, which is not being financially supported by the center but instead
our own residents. As for the Fire Department we have seen a significant increase in the number
of calls over the last ten years. These numbers have increased as the population has increased
but the number of calls to Corps. property has also doubled in the same time frame.

If you have any questions for me please feel free to contact me and I will be willing to help answer
them the best that I can.

Summary

- 22-5 1. Scales Bend Road had load embargos and is bad to drive in good weather conditions.
2. Roads into the campgrounds are not wide enough and needs to have the tree canopy
trimmed to at least 13 feet above ground.
21-7 3. Roads into the campground are to long without the proper turn around areas. These
need to be in place with strict rules concerning No Parking at anytime.
21-8 4. Conventior Center will have to have sprinkler system in place.
5. Water needs are approximately 2,247 gallons of water per minute over a time span of
four hours.
21-9 6. To effectively fight a fire we would need full mutual aid from the county and hope that no
other major structure catches fire in the county at the same time.
7. Weather conditions could add to delays
21-10 8. No dry hydrant will work on the camp site
21-11 9. Tent and cabin accessibility are difficult to obtain with hose lines
21-12 10. Who will have jurisdiction over building code enforcements
21-13 11. Fire Department should be compensated for coverage of commercial property
21-14 12. Storm shelter needs to be addressed for the safety of the people

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6-1-2
I would like to add on one more tanker in Johnson County is Kolona, which is 1500 gallons. To figure water shuttle you use number of tankers plus total water capacity of all tankers, Divided by driving time, which is driving to and from hydrant, fill time, unload, and staging Hook up to hydrant. I figure this to be about 20 minutes in good weather conditions

Total Tankers = 9
Total Capacity = 17,550
Total Drive Time Pre united 20 minutes

17,550 divided by 20 = 877.5 gallons of water pre minute

This means that they would have to be all the tankers their and in the shuttle at the same time and as you can see they are from across the hole county.

8-1-2
This means that they would have to provide water storage of 1,370 gallons pre minute and --- maintain this for 4 hours our 328,680 either through storage our pumps our both.

This building should be with sprinkler system; this means that they would have to have water storage for this system. I do not have the number of gallons this would be but this would be on top of the water that we would need.

